

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

*CR 18-18 DWF/LIB*

UNITED STATES OF AMERICA,

**INDICTMENT**

Plaintiff,

18 U.S.C. § 1591

18 U.S.C. § 1594

v.

21 U.S.C. § 853

28 U.S.C. § 2461

1. ANDRE MATHIS, JR.,  
a/k/a Isaac Brown, and
2. AMOS KIPROP KOECH,

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

**COUNT 1**

(Conspiracy To Commit Sex Trafficking of a Minor)

From on or about June 17 through on or about July 7, 2017, in the State and District of Minnesota, the defendants,

**ANDRE MATHIS, JR., and  
AMOS KIPROP KOECH,**

in and affecting interstate commerce, conspired with each other and others known and unknown to the Grand Jury to knowingly recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit VICTIM A, knowing and in reckless disregard of the fact and having had a reasonable opportunity to observe that VICTIM A had not attained the age of 18 years, to engage in a commercial sex act, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), and 1594(c).

**COUNT 2**

(Sex Trafficking by Force, Fraud and Coercion)

From on or about June 17 through on or about July 7, 2017, in the State and

**SCANNED**

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District of Minnesota, the defendant,

**ANDRE MATHIS, JR.,**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, and solicited VICTIM A to engage in a commercial sex act and attempted to do so, knowing that means of force, threats of force, fraud, coercion, and any combination of such means would be used to cause VICTIM A to engage in a commercial sex act, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), and 1594(a).

**COUNT 3**

(Sex Trafficking of a Minor)

From on or about June 17 through on or about July 7, 2017, in the State and District of Minnesota, the defendant,

**ANDRE MATHIS JR.,**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, and solicited VICTIM A to engage in a commercial sex act and attempted to do so, knowing and in reckless disregard of the fact and having had a reasonable opportunity to observe that VICTIM A had not attained the age of 18 years, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), and 1594(a).

**COUNT 4**

(Sex Trafficking of a Minor)

From on or about June 17 through on or about July 7, 2017, in the State and

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District of Minnesota, the defendant,

**AMOS KIPROP KOECH,**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, and solicited VICTIM A to engage in a commercial sex act and attempted to do so, knowing and in reckless disregard of the fact and having had a reasonable opportunity to observe that VICTIM A had not attained the age of 18 years, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), and 1594(a).

**FORFEITURE ALLEGATIONS**

Counts 1 through 4 of this Indictment are fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1594.

As a result of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 1594(d):

(1) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and

(2) any property, real or personal, involved in, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property, including (a) a black Samsung Virgin mobile side-slide cellular telephone, model SPH-M910, FCC ID A3LSPHM910; (b) a black LG cellular telephone, model LG620G with serial number 103CQTB424929; (c) a black LG cellular telephone, model LG620G with serial number 102CQHE423881; (d) a black LG Verizon cellular

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telephone, model LGVN251 with serial number 201CYHE1242377; (e) a black Alcatel One Touch cellular telephone, model 1018B with FCC ID RAD556; (f) a black Android cellular telephone with a cracked screen; (g) a black ZTE cellular telephone, model 2793C with serial number 326E52701A4D; (h) a black LG cellular telephone, model LGMP260 with serial number 706CYVU691943; and (i) a gray Motorola T-Mobile flip cellular telephone.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Sections 1591(a), 1591(b), 1591(c), 1594(a), 1594(c), and 1594(d), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON